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FILED CLERK, U.S. DISTRICT COURT
3/8/24
CENTRAL DISTRICT OF CALIFORNIA BY: <u>eee</u> DEPUTY

IN PRO PER

5 UNITED STATES DISTRICT COURT
6 CENTRAL DISTRICT OF CALIFORNIA

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8 TAYLOR THOMSON,

Case No.: 2:23-cv-04669-MEMF-MAR

9 Plaintiff,

10 vs.

11 ASHLEY RICHARDSON,

**OPPOSITION OF Plaintiff Taylor Thomson's
Memorandum of points and authorities in support of
MOtion to dismiss ashley richardsons ammended
counterclaims**

12 Counter Claimant

The Honorable Maame Ewusi-Men

Date: May 30, 2024

TIME: MAY 30, 2024

TIME 10:00 AM

COURTROOM: 8B

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18 **OPPOSITION TO PLAINTIFF'S MOTION TO DISMISS COUNTERCLAIMS**

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20 1. I, the defendant Ashley Richardson, oppose the plaintiff's motion to dismiss my amended counterclaims. To the best of my knowledge, I believe that the ammended counterclaim was adequately pled. As explained in the amended counterclaim, Ms Thomson made statements to individuals within my and Thomson's shared social circle and within my circle of industry that I had committed Fraud and Theft of cryptocurrency. These statements injured my reputation and also had an impact on my professional career.

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23 2. If what I have asserted in my counterclaims is not sufficient, I ask for the court to permit me to amend them to include more allegations that I thought would simply be evidence that could be introduced at trial to support my claims.

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SLANDER IN VIOLATION OF CAL. CIVIL CODE 46 (INCLUDING SLANDER PER SE)

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28 OPPOSITION OF PLAINTIFF TAYLOR THOMSON'S MEMORANDUM OF POINTS AND AUTHORITIES IN
SUPPORT OF MOTION TO DISMISS ASHLEY RICHARDSONS AMMENDED COUNTERCLAIMS THE
HONORABLE MAAME EWUSI-MENDATE: MAY 30, 2024 TIME: MAY 30, 2024 TIME 10:00
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- 1 3. Slander is defined by Civil Code section 46 as a “false and unprivileged publication, orally uttered, and
2 also communications by radio or any mechanical or other means which... tends directly to injure him in
3 respect to his office, profession, trade or business, either by imputing him to general disqualification in
4 those respects which the office or other occupation peculiarly requires, or by imputing something with
5 reference to his office, profession, trade, or business that has a natural tendency to lessen its profits. Civ
6 Code 46.
- 7 4. Less particularity is required in a complaint alleging slander when it appears that defendant has superior
8 knowledge to facts, so long as the pleading gives notice of the issues sufficient to enable preparation of a
9 defense. Moreover, an allegation is not defective for failure to state the exact words of the alleged slander.
10 Slander can be charged by alleging the substance of the defamatory statement. Okun v. Superior Court
(1981) 29 Cal. 3d 442.
- 11 5. Richardson has alleged that Thomson verbally disparaged her by telling individuals in her close social
12 circle as well as to potential employers and colleagues of Richardson that Richardson committed unlawful
13 acts and between November 2021 until the present time. These false statements caused catastrophic injury
14 to Richardson’s reputation, social standing, and ability to gain employment. Although I do have knowledge
15 and have been informed, in this instance Ms Thomson has superior knowledge.

INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS

- 12 6. I believe that my allegations against Ms Thomson in relation to the allegations of Intentional Infliction of
13 Emotional Distress, in addition to being entirely factual and as I experienced them, to the best of my
14 knowledge I believe they adequately pled.
- 15 7. Regarding extreme and outrageous conduct by the defendant, as explained Ms Thomson put a great deal of
16 pressure on me in relation to procuring crypto currencies at all hours of the day and night, and expected me
17 to custody them in my home, causing a great security risk. Ms Thomson also expressed she expected me to
18 be willing to take a bullet in lieu of providing potential intruders with her keys, should there be a security
19 breach. I have ample and excessive evidence that illustrates “extreme and outrageous conduct” and would
20 be happy to provide them in detail as we begin the discovery process and then at trial.

CONCLUSION

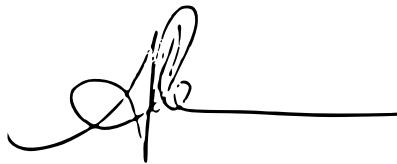
- 18 8. Contrary to the assertion of opposing council, I believe that that I have adequately pled both of my
19 counterclaims, but if the court disagrees, I can, and will add allegations to amended counterclaims.
- 20 9. I have explained in several filings that I do not have the funds to hire a lawyer to represent me in this case.
21 Having to represent myself has come with extreme stress and I have done my best to rely on the internet
22 and the kindness of friends and attorneys that have helped me in the past to complete this to the best of my
23 ability. Ultimately, I swear under penalty of perjury that ALL of the work in this pleading is my own. And,
24 with sincerest apologies to court, I believe that despite my best efforts this is evident.
- 25 10. For the foregoing reasons, I respectfully request that the motion to dismiss be denied.

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OPPOSITION OF PLAINTIFF TAYLOR THOMSON’S MEMORANDUM OF POINTS AND AUTHORITIES IN
SUPPORT OF MOTION TO DISMISS ASHLEY RICHARDSONS AMMENDED COUNTERCLAIMS THE
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AM COURTROOM: 8B - 2

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2 DATE: March 7, 2024

ASHLEY RICHARDSON – IN PRO PER

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Respectfully Submitted By:

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ASHLEY RICHARDSON

OPPOSITION OF PLAINTIFF TAYLOR THOMSON'S MEMORANDUM OF POINTS AND AUTHORITIES IN
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